Exhibit A

IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PRINCETON DIGITAL IMAGE CORPORATION,)
PLAINTIFF,)
V.)
)CASE NO.: 1:12-CV-00779-RJS
HEWLETT-PACKARD COMPANY,)
FUJIFILM NORTH AMERICA)
CORPORATION F/K/A FUJIFILM U.S.A.,)
INC. AND XEROX INTERNATIONAL)
PARTNERS,)
)
DEFENDANTS.)

SUPPLEMENTAL DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS AGAINST DEFENDANT FUJIFILM NORTH AMERICA CORPORATION F/K/A FUJIFILM U.S.A., INC.

Gregory M. Luck, P.C.(pro hac vice) **DUANE MORRIS, LLP** R. Terry Parker Thomas W. Sankey, P.C. (pro hac vice) Diana M. Sangalli (pro hac vice) 1540 Broadway Wesley W. Yuan (pro hac vice) New York, New York 10036 Telephone: (212) 692-1089 1330 Post Oak Blvd, Suite 800 Facsimile: (212) 214-0725 Houston, Texas 77056 Telephone: (713) 402-3900 Facsimile: (713) 583-9623 Kristina Caggiano (*pro hac vice*) **Suite 1000** 505 9th Street, N.W. Jeffrey S. Pollack (pro hac vice) Washington, DC 20004-2166 30 South 17th Street Telephone: (202) 776-5284 Philadelphia, PA 19103-4196 Facsimile: (202) 2478-2965 Telephone: (215) 979-1299 Facsimile: (215) 689-4942

Attorneys For Plaintiff Princeton Digital Image Corporation

Princeton Digital Image Corporation ("PDIC") submits this Supplement of its identification of the Accused Instrumentalities set forth in Section III(b) of its Disclosure of Asserted Claims and Infringement Contentions Defendant relating to Fujifilm North America Corporation f/k/a Fujifilm U.S.A., Inc. ("Fuji") served on April 1, 2011. PDIC believes that it fulfilled its disclosure obligation in its April 1, 2011 Disclosure. Nonetheless, PDIC is providing this Supplement pursuant to agreement between PDIC and Fuji. PDIC reserves the right to further supplement its identification of Accused Instrumentalities based on additional information that PDIC obtains through discovery or otherwise as this case progresses.

III(b) Accused Instrumentalities.

Based on information presently publicly available to PDIC and obtained through discovery to date, PDIC identifies with further specificity the Accused Instrumentalities as listed below. PDIC further includes all reasonably similar variants, versions and improvements of the below listed products.

<u>'056 Accused Instrumentalities:</u>

i. digital still camera products: including, but not limited to, the FinePix digital still camera product line, and other digital still camera products, including products that incorporate digital still cameras or have digital still imaging functionality, made, used, sold, offered for sale or imported by Fuji that operate in a reasonably similar manner with respect to employing codewords to digitally encode image data into a JPEG file.

Product Model Names:

Finepix 1300

Finepix 1400

Finepix 2300

Finepix 2400

Finepix 2600

Finepix 2650

Finepix 3800

Finepix 4700

Finepix 4800

Finepix 4900

Finepix 6800

- Finepix 6900
- Finepix A101
- Finepix A120
- Finepix A200
- Finepix A201
- Finepix A203
- Finepix A205
- Finepix A210
- Finepix A303
- Finepix A310
- Finepix A330
- Finepix A330
- Finepix A340
- Finepix A345
- Finepix A350
- Finepix A360
- Finepix A400
- Finepix A500
- Finepix A600
- Finepix A610
- Finepix A700
- Finepix A800/A805
- Finepix A820/A825
- Finepix A900
- Finepix A920
- Finepix E500
- Finepix E510
- Finepix E550
- Finepix E900
- Finepix F10
- Finepix F11
- Finepix F20
- Finepix F30
- Finepix F30i
- E. : E210
- Finepix F31fd
- Finepix F40fd/F45fd
- Finepix F40i
- Finepix F50fd
- Finepix F401
- Finepix F402
- Finepix F410
- Finepix F420
- Finepix F440
- Finepix F450
- Finepix F455
- Finepix F460
- Finepix F470
- Finepix F480

Finepix F601

Finepix F602Z

Finepix F610

Finepix F650

Finepix F700

Finepix F710

Finepix F810

F IS-1(IR/S9100Base)

Finepix ISPRO

Finepix M603

Finepix S2Pro

Finepix S3 Pro

Finepix S5PRO

Finepix S20 Pro

Finepix S602

Finepix S3000

Finepix S3100

Finepix S3500

Finepix S5000

Finepix S5100/S5500

Finepix S5200/S5600

Finepix S5700/S700

Finepix S5800/S800

Finepix S6000fd/S6500fd

Finepix S7000

Finepix S8000fd

Finepix S9100/S9600

Finepix S9000,/S9500

Finepix V10

Finepix Z1

Finepix Z2

Finepix Z3

Finepix Z5fd

Finepix Z10fd

Finepix Z100fd

Development Model Name:

CIO

H18

H19

H120

H130

H220

H321

H322

L120

L127

L300

L700

P200

SU-280

SU-350

SU-355

SU-370

SU-380

SU-390

SU-410 SU-420

SU-430US

SU-440U

SU-450

SU-460U

SU-470

SU-480U

SU-490

SU-500

SU-520

SU-525

SU-530

SU-531

SU-541 SU-546

SU-548

SU-560

SU-565

SU-580

SU-590

SU-1710 SU-1717

SU-1725

SU-1735

SU-1730

SU-1735D

SU-1740

SU-1760

SU-1775

SU-1780

SU-1810

SU-1820

SU-1830

SU-1835

SU-1840

SU-1845

SU-1850 SU-1860 SU-1870 SU-1875 SU-1880 SU-1885

SU-1890 T100

T200

Development Model:

Y-454

Y-466

Y-484

Y-499

Y-511

Y-526

Y-534

Y-558

Y-595

Y-596

Y-603

Y-633

Y-653

Y-663

Y-680

Y-690

Y-702

Y-712

Y-731

Y-732

Y-742

Y-749

Y-750

Y-762

Y-818

Y-826

Y-855

Y-863

Y-872

Y-880

Y-888

Y-900

Y-952 Y-962

Y-978

Y-1009 Y-1012 Y-1080 Y-1098 Y-1110 Y-1122 Y-1130 Y-1138 Y-1146 Y-1198 Y-1251 Y-1312 Y-1352 Y-1472 Y-1501 Y-1516 Y-1551 Y-1558 Y-1565 Y-1682 Y-1428 Y-1771 Y-1801 Y-1851 Y-2002

ii. <u>digital scanning products</u>: including, but not limited to, multi-function peripheral products, copiers and digital scanner products, including, but not limited to, the Image Scanner, Compact Color Scanner, and Digital Photo-Video Imager product lines, and other products that incorporate digital scanners, or have digital scanning functionality made, used, sold, offered for sale or imported by Fuji that operate in a reasonably similar manner with respect to employing codewords to digitally encode image data into a JPEG file.

Product Model Name:

Frontier Scanner SP2000
Frontier Scanner SP2500
Frontier 340-SLP-1000SE Laser PRN
Frontier Scanner SP3000
SP500 Scanner
Epson 1680 Special Edition
Epson 1660 FB Scanner/ADPC111
Epson 1680 Flatbed Scanner
Sony Scanner w/ APS
Epson Perfection 2480 Scanner

Epson Model 2400 Scanner
Epson 2480 Scanner (Refurb)
Epson Model 2480 Scanner
Epson Perfection 3490 Flatbed Scanner
Epson V200 Flatbed Scanner
FineScan 2750 XL
Quattro
C-550

'103 Accused Instrumentalities:

i. <u>digital still camera products</u>: including, but not limited to, the FinePix digital still camera product line, and other digital still camera products, including products that incorporate digital still cameras or have digital still imaging functionality, made, used, sold, offered for sale or imported by Fuji that operate in a reasonably similar manner with respect to automatic exposure control and/or automatic gain control for digital image processing.

Product Model Names:

Finepix 1300 Finepix 1400 Finepix 2300 Finepix 2400 Finepix 2600 Finepix 2650 Finepix 3800 Finepix 4700 Finepix 4800 Finepix 4900 Finepix 6800 Finepix 6900 Finepix A101 Finepix A120 Finepix A200 Finepix A201 Finepix A203 Finepix A205 Finepix A210 Finepix A303 Finepix A310 Finepix A330 Finepix A340 Finepix A345 Finepix A350 Finepix A360 Finepix A400 Finepix A500

Finepix A600

Finepix A610

Finepix A700

Finepix A800/A805

Finepix A820/A825

Finepix A900

Finepix A920

Finepix E500

Finepix E510

Finepix E550

Finepix E900

Finepix F10

Finepix F11

Finepix F20

Finepix F30

Finepix F30i

Finepix F31fd

Finepix F40fd/F45fd

Finepix F40i

Finepix F50fd

Finepix F401

Finepix F402

Finepix F410

Finepix F420

Finepix F440

Finepix F450

Finepix F455

Finepix F460

Finepix F470

Finepix F480

Finepix F601

Finepix F602Z

Finepix F610

Finepix F650

Finepix F700

Finepix F710

Finepix F810

F IS-1(IR/S9100Base)

Finepix ISPRO

Finepix M603

Finepix S2Pro

Finepix S3 Pro

Finepix S5PRO

Finepix S20 Pro

Finepix S602

Finepix S3000

Finepix S3100

Finepix S3500

Finepix S5000

Finepix S5100/S5500

Finepix S5200/S5600

Finepix S5700/S700

Finepix S5800/S800

Finepix S6000fd/S6500fd

Finepix S7000

Finepix S8000fd

Finepix S9100/S9600

Finepix S9000,/S9500

Finepix V10

Finepix Z1

Finepix Z2

Finepix Z3

Finepix Z5fd

Finepix Z10fd

Finepix Z100fd

Development Model Name:

CIO

H18

H19

H120

H130

H220

H321

H322

L120

L127

L300

L700

L/UC

P200

SU-280

SU-350

SU-355

SU-370

SU-380

SU-390

SU-410

SU-420

SU-430US

SU-440U

SU-450

SU-460U

SU-470

SU-480U

SU-490

SU-500

SU-520

SU-525

SU-530

SU-531

SU-541

SU-546

SU-548 SU-560

SU-565

SU-580

SU-590

SU-1710

SU-1717

SU-1725

SU-1735

SU-1730

SU-1735D

SU-1740

SU-1760

SU-1775

SU-1780

SU-1810

SU-1820

SU-1830

SU-1835

SU-1840

SU-1845

SU-1850

SU-1860

SU-1870

SU-1875

SU-1880

SU-1885

SU-1890

T100

T200

Development Model:

Y-454

Y-466

Y-484

Y-499

Y-511

- Y-526
- Y-534
- Y-558
- Y-595
- Y-596
- Y-603
- Y-633
- Y-653
- Y-663
- Y-680
- Y-690
- Y-702
- Y-712 Y-731
- Y-732
- Y-742
- Y-749
- Y-750
- Y-762
- Y-818
- Y-826
- Y-855
- Y-863
- Y-872
- Y-880
- Y-888
- Y-900
- Y-952
- Y-962
- Y-978
- Y-1009
- Y-1012 Y-1080
- Y-1098
- Y-1110
- Y-1122
- Y-1130
- Y-1138
- Y-1146
- Y-1198
- Y-1251
- Y-1312
- Y-1352
- Y-1472
- Y-1501
- Y-1516
- Y-1551

Y-1558 Y-1565 Y-1682 Y-1428 Y-1771 Y-1801 Y-1851 Y-2002

Discovery is ongoing. PDIC reserves the right to seek leave of Court to augment and supplement its disclosure of Accused Instrumentalities after further discovery from Fuji, or as permitted under the Patent Rules.

Respectfully submitted,

By: <u>/s/Terry Parker</u>

R. Terry Parker

DUANE MORRIS, LLP

1540 Broadway

New York, New York 10036 Telephone: (212) 692-1089 Facsimile: (212) 214-0725

Gregory M. Luck, P.C. (admitted *pro hac vice*) Thomas W. Sankey, P.C. (admitted *pro hac vice*) Diana M. Sangalli (admitted *pro hac vice*) Wesley W. Yuan (admitted *pro hac vice*)

DUANE MORRIS, LLP

1330 Post Oak Blvd, Suite 800

Houston, Texas 77056 Telephone: (713) 402-3900

Facsimile: (713) 583-9623

Jeffrey S. Pollack (admitted *pro hac vice*)

DUANE MORRIS LLP

30 South 17th Street

Philadelphia, PA 19103-4196

Telephone: (215) 979-1299 Facsimile: (215) 689-4942

ATTORNEYS FOR PLAINTIFF,

PRINCETON DIGITAL IMAGE CORPORATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that below were served with a true and correct copy of the foregoing by electronic mail on this the 31th day of July 2013.

William H. Mandir (wmandir@sughrue.com)
Yoshinari Kishimoto (ykishimoto@sughrue.com)
Brian K. Shelton (bshelton@sughrue.com)
Kelly G Hyndman(kghyndman@sughrue.com)
John F Rabena (jrabena@sughrue.com)
Mark J. Deboy (mdeboy@sughrue.com)
Sughrue Mion PLLC
2100 Pennsylvania Ave., NW
Washington, DC 20037

J. Thad Heartfield (thad@jth-law.com)
M. Dru Montgomery (dru@jth-law.com)
The Heartfield Law Firm

Richard A.Williamson (rwilliamson@fzwz.com) Craig S. Kesch (ckesch@fzwz.com) Flemming Zulack Williamson Zauderer, LLP One Liberty Plaza New York, NY 10006

Attorneys for Defendant Xerox International Partners

Steven J. Routh (srouth@orrick.com) Sten A. Jensen (sjensen@orrick.com) Orrick, Herrington & Sutcliffe LLP 1152 15th Street, NW Washington DC 20005

Clifford R. Michel (cmichel@orrick.com)

Attorneys for Defendant Fujifilm North America Corporation Brian K. Erickson (brian.erickson@dlapiper.com) **DLA Piper US LLP**401 Congress Ave., Suite 2500
Austin, TX 78701-3799

Erin P. Gibson (erin.gibson@dlapiper.com)
Sean C. Cunningham
(sean.cunningham@dlapiper.com)

DLA Piper US LLP

401 B Street
Suite 1700

Attorneys for Defendant Hewlett-Packard Company

San Diego, California 92101-4297

/s/ R. Terry Parker R. Terry Parker